

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MATTHEW BROWN and
MATTHEW BROWN COMPANIES, LLC,

Defendants.

Civ. Action No. 4:24-cv-00558-O

JURY TRIAL DEMANDED

DECLARATION OF MATTHEW R. BROWN

I, Matthew R. Brown declare as follows:

In support:

1. I am the Individual Defendant in this action and the Managing Member of Defendant Matthew Brown Companies, LLC.
2. I am authorized to speak and act on behalf of Matthew Brown Companies, LLC in this litigation.
3. I previously executed a Consent to entry of Final Judgment in this matter on February 28, 2025.
4. I have since reconsidered my position and determined that the claims asserted against me and Matthew Brown Companies, LLC are wholly without merit.
5. I am in the process of retaining experienced and high-profile trial counsel to defend this action.

6. I am fully prepared to proceed to trial and to adhere to an expedited discovery and trial schedule.
7. I am actively cooperating in related civil litigation involving Virgin Orbit and related parties.
8. I believe, based upon the record, deposition testimony, and witness interviews, that Plaintiff's claims lack factual support.
9. I make this Declaration in support of the Defendants' Notice of Withdrawal of Consent and Motion to Vacate Proposed Final Judgment.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: March 29, 2025
Palm Beach County, Florida

Respectfully submitted,


/s/ Matthew R. Brown